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December 17, 2020

VIA ECF & E-MAIL

Hon. Andrew L. Carter, Jr.
U.S. District Judge
U.S. District Court for the Southern District of New York
40 Foley Square, Courtroom 1306
New York, NY 10007
ALCarterNYSDChambers@nysd.uscourts.gov

MEMO ENDORSED

Re: *Swartz v. 50 Bowery Holdings LLC,*
     Civil Action No.: 1:20-cv-08613 (S.D.N.Y.)

Dear Judge Carter:

This office represents Defendant 50 Bowery Holdings LLC ("Defendant") in the above-referenced matter. We write, with the consent of Plaintiff Helen Swartz ("Plaintiff"), to respectfully request a 14-day extension of the deadline for Defendant to respond to the Complaint, up to and including January 4, 2021.

By way of background, the original deadline for Defendant to respond to the Complaint was November 20, 2020. On November 10, 2020, the Court granted Defendant's first letter motion for an extension of this deadline. (ECF No. 8.) Pursuant to the Court's Order, Defendant's current deadline to respond to the Complaint is December 21, 2020. (*Id.*)

Defendant respectfully requests that this deadline be extended by 14-days, up to and including January 4, 2021. This is the second request for an extension of Defendant's responsive pleading deadline. Defendant is requesting this extension to allow the parties to continue settlement discussions which are ongoing. We have communicated with counsel for Plaintiff, and Plaintiff consents to this request.

We respectfully submit this request in good faith and not to cause undue delay. The granting of this application will not impact any other scheduled deadlines. We thank the Court for its time and attention to this matter.

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

Dated: December 18, 2020

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Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Samuel Sverdlov

Samuel Sverdlov